

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND

IN RE: CLARENCE E. BROWN, JR.      B.K. NO.: 1:12-bk-13040  
Debtor

AMENDED OBJECTION TO MOTION FOR RELIEF FROM STAY

Debtor, by his attorney, objects to the Motion for Relief From Stay.

The original party filing this motion was EMC Mortgage, LLC. There is a new loan servicer, Statebridge Company, LLC, which claims to represent a new alleged owner of the note and mortgage, Wilmington Savings Fund Society, FSB, not its individual capacity but solely as Trustee of the Primestar-H Fund I Trust. There is no chain of title of the note or the mortgage from the originator to either EMC Mortgage, LLC or Primestar-H Fund I Trust. The movant is not the real party in interest and lacks standing to file this Motion.

Wherefore, Debtor Objects to the Motion for Relief from Stay and requests the opportunity for discovery and an evidentiary hearing.

CLARENCE E. BROWN, JR.

By his Attorney

/s/ John B. Ennis

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CERTIFICATION

I hereby certify that I forwarded a copy of the above Amended Objection to Motion for Relief From Stay to the following by either electronic filing or by regular mail, postage prepaid on this 26th day of September, 2013:

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